Case 1:18-cr-00217-KMW Bocument 148 Filed 09/23/19 Page 1 of 1

CHAMBERS OF KIMBA M. WOOD

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STUART GOLD

September 23, 2019

VIA ECF

**BENJAMIN BRAFMAN** 

MARK M BAKER

OF COUNSEL

MARC A. AGNIFILO

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Honorable Kimba M. Wood United States District Court Southern District of New York 500 Pearl St. New York, NY 10007-1312

MEMO ENDORSED

Re: United States v. Goldstein, 18 CR 217 (KMW)

Dear Judge Wood:

As part of the bail conditions in the above-referenced case, Dr. Jeff Goldstein's travel was limited to the Southern and Eastern Districts of New York (as well as New Jersey for counsel visits). We now write the Court requesting a modification of these travel restrictions to allow Dr. Goldstein to travel to New Jersey from October  $12^{th} - 14^{th}$ , 2019, to attend his son's soccer tournament, as well as to Austin, Texas, from October  $17^{th} - 21^{st}$ , 2019, to meet with an attorney representing his medical practice. Dr. Goldstein will provide his itinerary to Pretrial Services in advance of his trips.

Granted

We have spoken with the Government (AUSA Noah Solowiejczyk) and Pretrial Services (Officer Winter Pascual), and both have no objection to our request. Thank you for your consideration.

Respectfully submitted,

s/ Jacob Kaplan

9-24-19

cc: AUSA Noah Solowiejczyk (via ECF)

SO ORDERED: N.Y., N.Y.

Pretrial Services Officer Winter Pascual (via email)

KIMBA M. WOOD U.S.D.J.